

EXHIBIT A

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MASSACHUSETTS
3 C.A. No. 04-11193NG

4 SHAWN DRUMGOLD,

5 Plaintiff,

6 vs.

DEPOSITION OF:

7 TIMOTHY CALLAHAN, FRANCIS M. MADELYNE POWELL HAMILTON
8 ROACHE, THE ESTATE OF PAUL
9 MURPHY, RICHARD WALSH, AND
THE CITY OF BOSTON

10 Defendants.
11

12 T R A N S C R I P T of the stenographic
13 notes of the proceedings in the above-entitled
14 matter, taken by and before DEBRA DeLOOF, a
15 Certified Shorthand Reporter and Notary Public of
16 the State of New Jersey, held at the offices of
17 McCarter & English, Esqs., 245 Park Avenue, New York,
18 New York, on Tuesday, March 13, 2007
19 at 10:00 a.m.
20
21
22
23
24
25

1 APPEARANCES:

2 ROSEMARY SCAPICCHIO, ESQ.
3 Four Longfellow Place
4 Boston, Massachusetts 02114
5 Attorneys for Plaintiff

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10 Attorneys for Defendant, Timothy Callahan

11 ROACHE & ASSOCIATES, P.C.
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16 and City of Boston

17 DAVIS, ROBINSON & WHITE, LLP
18 BY: WILLIAM M. WHITE, JR., ESQ.
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21 Boston, Massachusetts 02109
22 Attorneys for Defendant, Estate of Paul Murphy

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Boston, Massachusetts 02109
Attorneys for Defendant, Richard Walsh

MADELYNE POWELL HAMILTON, Appearing Pro Se

ALSO PRESENT: JIM ROBERTS, Videographer

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1 THE VIDEOGRAPHER: We're going on the
2 record My name is James Roberts of Nationwide
3 Video Productions Incorporated, located in Roseland,
4 New Jersey. The date is March 13th 2007. The time
5 is approximately 10:36 am. This deposition is
6 being held in the office of McCarter & English
7 located at 245 Park Avenue, New York City, New York.

8 The caption of the case is Shawn
9 Drumgold versus City of Boston, et al. in the U.S.
10 District Court District of Massachusetts, case
11 number C.A. No. 04-CV-11193-NG. The name of the
12 witness is Madelyne Powell Hamilton

13 At this time the attorneys will
14 identify themselves and the parties they represent
15 after which our Court Reporter, Debbie DeLoof of
16 Doerner & Goldberg, will swear in the witness.

17 MS. HARRIS: Mary Jo Harris for Tim
18 Callahan.

19 MR. WHITE: William White far
20 Patricia Murphy, Executrix of the Estate of Paul
21 Murphy.

22 MR. ROACHE: John Roache representing
23 the City of Boston and Francis M. Roache.

24 MR. CURRAN: Hugh Curran representing
25 Richard Walsh.

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1 MS. SCAPICCHIO: Rosemary Scapicchio
2 on behalf of Shawn Drumgold.

3 We object to the videotaping of this
4 deposition. We weren't properly notified Had we
5 been properly notified both counsel, myself and
6 attorney Reilly would have been here. Defendants
7 gave us no opportunity to continue this deposition
8 and refused to allow Mr. Reilly who has a son sick
9 in the hospital to attend this deposition.

10 MADELYNE POWELL HAMILTON,
11 having been first duly sworn was examined
12 and testified as follows:

13 DIRECT EXAMINATION BY MS. HARRIS:

14 Q. Good morning, ma'am. Can you please
15 state your full name for the record?

16 A. Madelyne C. Powell Hamilton.

17 Q. Ms. Hamilton, you understand that you're
18 here today for a deposition in the case that's been
19 brought by Shawn Drumgold against the City of Boston
20 and a number of police officers?

21 A. Yes.

22 Q. Have you ever been deposed before?

23 A. No.

24 Q. I'm going to give you then just some
25 guidelines. I am going to ask you questions. Other

1 counsel may also ask you questions. I would ask that
 2 you give me the opportunity to finish the question
 3 before you answer it even if you know what I'm asking
 4 you. The Court Reporter takes down my questions and
 5 your answers and if we talk over one another it makes
 6 it very difficult for us to have a clean transcript.
 7 Okay. You also have to give verbal responses rather
 8 than shake of the head or uh-huhs, na-ah's, those
 9 sorts of responses, just so we are clear on the
 10 questions and your answers to those questions.
 11 A. Yes.
 12 Q. Are you taking any medication today that
 13 could affect your ability to answer these questions?
 14 A. No.
 15 Q. Are you suffering from any physical
 16 condition that would affect your ability to understand
 17 my questions and testify truthfully today?
 18 A. No.
 19 Q. Have you spoken to anybody with — about
 20 your coming here for a deposition today?
 21 A. Yes.
 22 Q. Can you just tell us who those persons
 23 are?
 24 A. Everybody?
 25 Q. Yes, please.

1 A. I spoke to John Gamel, my daughter
 2 Rhonda, Roz, my granddaughter, Rashawna Lewis, I spoke
 3 to someone, an attorney Denner, Denner's office.
 4 Q. That's Denner's office in Boston?
 5 A. Yes, it was a Boston number. I spoke to
 6 I think it was — I can't pronounce your last name.
 7 MS. SCAPICCHIO: Scapicchio.
 8 THE WITNESS: Okay, Scapicchio.
 9 A. I spoke to someone named Adam he was
 10 from her office, Scapicchio's office. And I spoke to,
 11 I don't remember their names I was going through the
 12 phone book because I didn't know whether or not I
 13 needed to have representation, a lawyer or not So I
 14 was picking numbers and asking, you know, what do I
 15 do, you know.
 16 Q. When you say you were going through the
 17 phone book, do you mean to say that you were calling
 18 different attorney's offices?
 19 A. First I called the Bar Referral.
 20 Q. Okay.
 21 A. Is that the correct thing, the Bar on --
 22 yeah, and then they gave me like three names that I
 23 could call and I think I might have called one out of
 24 that and my mother, I spoke to my mother, Maddy B.
 25 Powell in Boston. And my brother, Joshua Powell in

1 Boston.
 2 Q. Anyone else that you can think of?
 3 A. I think that's -- I think that's pretty
 4 much it.
 5 Q. Now. I'm going to show you a document,
 6 this is a subpoena and I'll ask you if you've seen
 7 this before?
 8 A. Oh -- and I did speak to a person about
 9 the one that was coming to do that, I'm sorry.
 10 Q. To serve the subpoena?
 11 A. Yes.
 12 Q. This is the subpoena, a copy of the
 13 subpoena that he gave you?
 14 A. Yes -- she didn't, the person that first
 15 gave me one I explained that I didn't want to do this.
 16 I didn't want to whatever the deposition was. I told
 17 her if she came I wouldn't answer the door, which I
 18 didn't, and she slipped it underneath the door.
 19 That's how I got the first one.
 20 Q. And then the second one you receive in
 21 hand, correct, somebody gave it to you?
 22 A. Yes, yes.
 23 MS. HARRIS: We're going to mark this
 24 as the next exhibit and we're on No. 222.
 25 (Exhibit No. 222, Subpoena, was

1 marked for identification at this time.)
 2 Q. Ms. Hamilton, if you want to take a
 3 break at any time just let us know as we explained
 4 prior to starting the deposition, we'll accommodate
 5 you if you want to take a break.
 6 A. Thanks.
 7 Q. Can you tell me, ma'am, where you
 8 currently reside?
 9 A. The address is 535 West 51st Street,
 10 Apartment 7F like Frank, New York City and the ZIP
 11 code is 10019.
 12 Q. Who lives with you, if anybody, at that
 13 address?
 14 A. My five grand children.
 15 Q. Can you give us their names?
 16 A. And my dog.
 17 Q. Okay. Can we get the names of your
 18 grandchildren, please?
 19 A. Rashawna Drumgold Lewis, Madelyne C.
 20 Powell, Kayla Dorsett Powell, Tinisha Cash Powell and
 21 Tyleek Cash Powell.
 22 Q. Is Rashawna married?
 23 A. No, no.
 24 Q. But she uses the last name Lewis?
 25 A. Yes.

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<p>1 Q. Can you tell me how old is Rashawna?</p> <p>2 A. Rashawna is 23.</p> <p>3 Q. And Madelyne Powell?</p> <p>4 A. Sixteen.</p> <p>5 Q. And Kayla?</p> <p>6 A. Nine.</p> <p>7 Q. Tiniyah?</p> <p>8 A. Just turned six today.</p> <p>9 Q. And how old is Tyleek?</p> <p>10 A. Five.</p> <p>11 Q. And are these children all children of</p> <p>12 your daughter Rhonda?</p> <p>13 A. Yes.</p> <p>14 Q. And I believe you said that her last</p> <p>15 name is Ross; is that correct?</p> <p>16 A. Yes, that's her married name.</p> <p>17 Q. Am I correct in understanding that you</p> <p>18 have adopted your grandchildren, that you're their</p> <p>19 legal guardian?</p> <p>20 A. I've adopted all my grandchildren except</p> <p>21 Rashawna and Shawn.</p> <p>22 Q. And Shawn, Jr. is the young man we were</p> <p>23 just speaking about who just joined the Marines?</p> <p>24 A. Right he's in the Marines.</p> <p>25 Q. And those are — both Rashawna and</p>	<p>1 A. All the time.</p> <p>2 Q. Do you know approximately how long ago</p> <p>3 the last judgment on adoption occurred, and just the</p> <p>4 year, I don't need anything more specific?</p> <p>5 A. Last year, yeah, '06.</p> <p>6 Q. How long have you lived at 535 West 51st</p> <p>7 Street?</p> <p>8 A. Twenty-three years.</p> <p>9 MS. SCAPICCHIO: Excuse me, Mary Jo,</p> <p>10 are we doing usual stipulations?</p> <p>11 MS. HARRIS: Okay. Yes, I forgot to</p> <p>12 put that on. We'll put on that the parties have</p> <p>13 agreed to waive all objections except as to form of</p> <p>14 the question until the time of trial. The witness</p> <p>15 will be sent a copy of her transcript to read and</p> <p>16 sign. We'll waive the notary.</p> <p>17 Q. That's information that we have agreed</p> <p>18 to previously in the discovery in this case, we have</p> <p>19 the same rule that's bind each of these depositions.</p> <p>20 So you moved to this address 23 years ago which is</p> <p>21 1984, is my math correct?</p> <p>22 A. No, let me see, I signed my first lease</p> <p>23 there 1980, 1980.</p> <p>24 Q. And at the time that you moved to this</p> <p>25 apartment in 1980 who if anyone was living with you?</p>
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<p>1 Shawn, Jr. are adults?</p> <p>2 A. Yes.</p> <p>3 Q. Did you have to go through a formal</p> <p>4 legal process to adopt the other four?</p> <p>5 A. Yes.</p> <p>6 Q. Is that done in the state courts here in</p> <p>7 New York?</p> <p>8 A. Yes.</p> <p>9 Q. Do you know when about that took place</p> <p>10 or— strike that</p> <p>11 So there were different proceedings</p> <p>12 for each child?</p> <p>13 A. Each, yeah, they didn't come in a</p> <p>14 package, they just dribbled,</p> <p>15 Q. Do you know which court you were in for</p> <p>16 that, for those proceedings?</p> <p>17 A. All of them were in the Bronx family</p> <p>18 court, the final adoption for Madelyne and Kayla was</p> <p>19 in Manhattan family court and the final was in Bronx</p> <p>20 family court with Judge Gail Roberts.</p> <p>21 Q. Did you have to be interviewed by a</p> <p>22 social worker?</p> <p>23 A. All the time.</p> <p>24 Q. So those sorts of visits went on with</p> <p>25 your home, things of that nature?</p>	<p>1 A. Rhonda, Rhonda Ross and my boyfriend</p> <p>2 Quentin Lewis.</p> <p>3 Q. Have you any other children besides</p> <p>4 Rhonda?</p> <p>5 A. Yeah, well, yes.</p> <p>6 Q. I understand that you've adopted so</p> <p>7 these children are your children, but does Rhonda have</p> <p>8 siblings?</p> <p>9 A. One, she had one.</p> <p>10 Q. Can you give me that child's name?</p> <p>11 A. Tonya Mohammad.</p> <p>12 Q. From the way you answered is that child</p> <p>13 no longer living?</p> <p>14 A. No, she passed.</p> <p>15 Q. Can you tell us what your educational</p> <p>16 background is?</p> <p>17 A. 11th grade.</p> <p>18 Q. Where did you go to high school?</p> <p>19 A. Jeremiah E. Burke High School.</p> <p>20 Q. Did you grow up in Boston?</p> <p>21 A. Yes.</p> <p>22 Q. And you mentioned speaking to your</p> <p>23 mother Maddy Powell, does she still live in Boston?</p> <p>24 A. Yes.</p> <p>25 Q. And your brother Joshua is also a Boston</p>

4 (Pages 10 to 13)

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1 resident?
 2 " A. Yes.
 3 Q. Is the first time that you lived in New
 4 York 1980 when you moved to the apartment that you're
 5 currently in?
 6 A. I lived with my aunt for a short period
 7 of time to get the feel and find an apartment.
 8 Q. You lived with your aunt in New York
 9 City?
 10 A. Right. It was a very short period of
 11 time, maybe a couple of months, and then I moved to
 12 hotel, Rhonda Williams Hotel.
 13 Q. Is that also here in New York?
 14 A. That's on 31st Street right.
 15 Q. Was that also for a relatively short
 16 period of time?
 17 A. It was about eight months.
 18 Q. Was that in 1979?
 19 A. That was in '78, '79, going into '79.
 20 Q. Did you ever live in Boston again after
 21 moving to New York in the late seventies?
 22 A. No, never came back.
 23 Q. So your permanent address has been here
 24 in New York since you moved here?
 25 A. Yes.

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1 Q. Just a couple more preliminaries. Can
 2 you give me your date of bulk, please?
 3 A. [REDACTED]
 4 Q. And your Social Security number?
 5 A. [REDACTED]
 6 Q. Mrs. Hamilton, are you currently
 7 employed?
 8 A. No, I receive SSI.
 9 Q. Can you tell me what is the last
 10 position that you held prior to being on SSI?
 11 A. As a telephone solicitor and -- briefly
 12 worked with the Grandparents Association.
 13 Q. Can you tell me roughly when that was?
 14 A. Ten years.
 15 Q. Ten years ago, so like maybe 1997, '98
 16 or thereabouts?
 17 A. About
 18 Q. Now, the subpoena that was sent to you
 19 fisted some documents that we had asked you to
 20 provide, I'll show you the second page, and can you
 21 tell me did you make a review of your records for any
 22 documents that would be responsive to these requests?
 23 A. There was gobs and gobs of letters,
 24 from — I didn't know which ones to bring, a lot of
 25 them were directed towards Rashawna and Shawn.

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1 Q. Why don't we go through these
 2 individually. The first list of documents is any
 3 correspondence between yourself and Shawn Drumgold
 4 and/or any representatives of Shawn Drumgold. do you
 5 have any letters that exist that either you wrote to
 6 Mr. Drumgold or that he wrote to you in your
 7 possession?
 8 A. No, no. There may be a couple somewhere
 9 but there was a time when Shawn Drumgold and I weren't
 10 seeing eye to eye and I threw a lot of, I got rid of a
 11 lot of his things.
 12 Q. Do you remember when approximately it
 13 was that you got rid of these things?
 14 A. Maybe in 2000. I kept them a long time.
 15 Q. Do you remember what these things were
 16 that you had, were they letters, notes, things like
 17 that?
 18 A. Letters.
 19 Q. And letters that he wrote to you?
 20 A. Letters he wrote.
 21 Q. Do you remember the content of any of
 22 these letters?
 23 A. They were mostly thanking me for you
 24 know raising his kids, thank you for bringing them
 25 from New York to Boston to see him. Some were about

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1 Rhonda and that's basically you know.
 2 Q. Do you remember what the letters were
 3 that were about Rhonda, do you remember what he wrote
 4 to you?
 5 A. He always said that he loved Rhonda, you
 6 know that he loved Rhonda and then if he heard
 7 something or whatever then the next few letters
 8 weren't very good about Rhonda, and it was back and
 9 forth.
 10 Q. Back and forth in terms of his affection
 11 or lack of affection?
 12 A. Right
 13 Q. Are these — do you remember any letters
 14 that were about topics other than his thanking you for
 15 caring for his children and about his feelings for
 16 Rhonda?
 17 A. No.
 18 Q. Are these letters that you received from
 19 him while he was incarcerated?
 20 A. Yes.
 21 Q. Do you recall any letters from
 22 Mr. Drumgold that discussed in any way the trial of
 23 Tiffany Moore?
 24 MS. SCAPICCHIO: The trial of Tiffany
 25 Moore?

5 (Pages 14 to 17)

Page 22

1 Q. Why don't we see how many you have and
2 we would like to mark these, which means we would put
3 stickers on the back; is that okay?

4 A. Yeah, sure. And this was when they were
5 living on Seaver Street in Boston with the baby, with
6 little Shawn.

7 Q. Why don't we take - are these - all of
8 these pictures have Shawn Drumgold in them. Let's
9 just get them together and then we'll identify them.

10 A. That's a --

11 MS. SCAPICCHIO: I'm sorry; that's
12 what, I didn't hear you.

13 A. -- that's from a newspaper. I tried to
14 save photos for his kids. That's basically all the
15 photos that I brought

16 Q. Why don't we mark these so that we can
17 have you identify them, there are 11 photographs in
18 total, I'm counting as one photograph three that are
19 laminated together.

20 MS. HARRIS: And if we could mark
21 these I propose that we do it as a set, 223A through
22 whatever. Agreeable?

23 MR. WHITE: Very good

24 (Exhibit No. 223 A through K,
25 Photographs, were marked for

Page 24

1 Q. On the back of the photograph of
2 Mr. Drumgold it reads I believe; to Rashawna from
3 daddy?

4 A. Yes.

5 Q. Is that a photograph that he gave to -

6 A. Yes, that's his writing.

7 Q. Okay. And Exhibit 223B, if you could
8 identify that for me?

9 A. Okay. That's Shawn, Rhonda, little
10 Shawn and Rashawna.

11 Q. Do you know when this photograph was
12 taken?

13 A. That was taken the day he came to my
14 house and that's the picture that was in the Boston
15 Globe.

16 Q. When you say this is the day that he
17 came to your house, do you mean in August of 1988?

18 A. Yes.

19 Q. And what is Shawn, Jr.'s date of birth?

20 A. 8/26/85.

21 Q. Do you recall if Shawn Drumgold, Sr.'s
22 visit to your house was on little Shawn's birthday?

23 A. I can't recall if it was on his birthday
24 but it was like a day or two, it was like a day or
25 two, but it was like one o'clock in the morning when

Page 23

1 identification at this time.)

2 Q. Mrs. Hamilton, I'm going to show you
3 what's been marked Exhibit 223A and ask you if you can
4 identify this for me, that is, explain to me who is in
5 these three photographs?

6 A. Okay. That's Shawn Drumgold. These are
7 his two children, Rashawna and Shawn. That's Rhonda.
8 And that's Rashawna when she was born. She was born
9 3 pounds, two ounces, and she was handicapped. She
10 was born with no -- she was born with no -- club hands
11 and no thumbs.

12 Q. What is Rashawna's date of birth?

13 A. 10/3/83.

14 Q. Do you recall where she was born, was
15 she in New York or Boston?

16 A. She was born in Lenox Hill Hospital.

17 Q. Here in New York?

18 A. New York, yes.

19 Q. There's also a clip here looks like a
20 media clip announcing that the trial is about to
21 start?

22 A. Right.

23 Q. Is this a clip that you preserved and
24 put with these three photographs?

25 A. Yes.

Page 25

1 he came.

2 Q. Okay. Let's go through the rest of
3 these. I'm going to show you what's been marked
4 Exhibit 223C and ask you to identify it, please?

5 A. That's a picture that Shawn sent from I
6 don't know where -- I don't know what facility he was
7 in but he was in a facility, I don't know which one.

8 Q. A correctional facility?

9 A. Uh-huh.

10 Q. I'm sorry you have to say yes or no?

11 A. I'm sorry, yes.

12 Q. Was this after he had been convicted of
13 the Tiffany Moore killing?

14 A. No, this was before.

15 Q. Do you remember when roughly in what
16 time frame this photograph was taken?

17 A. I honestly can't say.

18 Q. Same question but this is Exhibit 223D,
19 if you can tell me what that represents please?

20 A. When he was going out with Rhonda.

21 Q. Do you remember roughly when that was?

22 A. '82 maybe. This was before Rashawna,

23 Q. Do you know where that photograph was
24 taken?

25 A. It was taken in front of Blue Hill

7 (Pages 22 to 25)

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<p>1 with you that reference that arrest?</p> <p>2 A. There's part -- on the paper, one of</p> <p>3 those papers, that's laminated I think with Rhonda.</p> <p>4 Q. Do you have it with you today?</p> <p>5 A. I think I showed it to you. This is</p> <p>6 just one. the warrant that I had for Rhonda to bring</p> <p>7 her home from Boston to bring her back.</p> <p>8 Q. Okay.</p> <p>9 A. No. You must have it there, it must be</p> <p>10 part of something.</p> <p>11 Q. Well, the -- there is a clipping</p> <p>12 attached to Exhibit 223 A but that refers --</p> <p>13 A. No here, that one. I must have threw</p> <p>14 the. the other part where it says continue from one, I</p> <p>15 don't know what happened to that, to the one.</p> <p>16 Q. Okay. And can we mark this one as well?</p> <p>17 A. Sure.</p> <p>18 MS. HARRIS: So why don't we make</p> <p>19 this 223L.</p> <p>20 (Exhibit No. L, Photograph, was</p> <p>21 marked for identification at this time.)</p> <p>22 Q. Mrs. Hamilton, are there any other</p> <p>23 clippings related to Shawn Drumgold, or the subject</p> <p>24 matter of this deposition that you brought with you</p> <p>25 today, other than these documents?</p>	<p>1 Q. Where were you living at that time when</p> <p>2 Rhonda was going to school in Newton?</p> <p>3 A. I was living at Two New Acre Road in</p> <p>4 Hyde Park.</p> <p>5 Q. So earlier you had said that you thought</p> <p>6 you moved to New York in maybe '79 or so. This is I</p> <p>7 believe you said in 1981 that Rhonda began seeing</p> <p>8 Shawn Drumgold?</p> <p>9 A. No, she started seeing -- she started</p> <p>10 seeing him before then.</p> <p>11 Q. Okay.</p> <p>12 A. That's when I caught them.</p> <p>13 Q. In 1981 were you living in Hyde Park?</p> <p>14 A. My husband was still living there,</p> <p>15 Richard was still living there.</p> <p>16 Q. Did you spend time in Hyde Park and in</p> <p>17 New York?</p> <p>18 A. I didn't - once I got my divorce in '76</p> <p>19 I didn't go back to Richard.</p> <p>20 Q. Was Rhonda living with her grandparents?</p> <p>21 A. Yes. That's the only way that -- she</p> <p>22 was eligible to get into Metco, you had to be in a</p> <p>23 certain, have you know, a certain area, a certain</p> <p>24 whatever.</p> <p>25 Q. You had to be in a certain geographical</p>
Page 31	Page 33
<p>1 A. No.</p> <p>2 Q. The clipping that you've just produced,</p> <p>3 it's missing the front page, but do you know</p> <p>4 approximately when that was published?</p> <p>5 MS. SCAPICCHIO: Objection.</p> <p>6 A. Most likely '84. Rashawna was already</p> <p>7 born.</p> <p>8 MS. SCAPICCHIO: Objection.</p> <p>9 Q. Okay, Mrs. Hamilton, when did you first</p> <p>10 meet Shawn Drumgold or become aware - strike that</p> <p>11 When did you first meet him?</p> <p>12 A. 19 maybe 81.</p> <p>13 Q. How did it come about that you met him?</p> <p>14 A. I had got a call from Rhonda's school in</p> <p>15 Newton that she wasn't --</p> <p>16 MS. SCAPICCHIO: Objection.</p> <p>17 A. -- attending school. And I followed her</p> <p>18 to the bus stop which is Blue Hill Avenue and Seaver</p> <p>19 and my parents lived on Seaver Street And I walked</p> <p>20 up to the bus stop and I waited a few minutes and</p> <p>21 that's when I saw Shawn, you know, meet up with her</p> <p>22 and that's when I - all hell broke loose.</p> <p>23 MS. SCAPICCHIO: That's what I'm</p> <p>24 sorry?</p> <p>25 THE WITNESS: All hell broke loose.</p>	<p>1 area?</p> <p>2 A. Right, right.</p> <p>3 Q. So in 1981 you got the call from the</p> <p>4 school in Newton that Rhonda wasn't attending classes?</p> <p>5 MS. SCAPICCHIO: Objection.</p> <p>6 Q. Is that right?</p> <p>7 A. That's correct.</p> <p>8 Q. And at that time in 1981 were you living</p> <p>9 in Massachusetts?</p> <p>10 A. No.</p> <p>11 Q. How is it that you were in Massachusetts</p> <p>12 to-</p> <p>13 A. My mother would call me and I would take</p> <p>14 Amtrak or the bus or the plane and I would come back.</p> <p>15 Q. Okay. After you found Rhonda leaving</p> <p>16 the bus stop did you have any discussions then with</p> <p>17 Shawn Drumgold?</p> <p>18 A. We had an argument It wasn't a</p> <p>19 discussion.</p> <p>20 Q. Okay. What do you remember about that</p> <p>21 encounter?</p> <p>22 MS. SCAPICCHIO: Objection.</p> <p>23 A. I asked him how old he was. He</p> <p>24 wouldn't -- he wouldn't give me a direct answer on how</p> <p>25 old he was.</p>

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1 A. No. Rashawna just, Rashawna was upset
 2 because this woman was in her house all over her
 3 father and so --
 4 MS. SCAPICCHIO: Objection.
 5 A. -- her mother had called, collect. And
 6 I asked Rhonda who was and then Rhonda went in to
 7 explain who she knows Micky to be and who she was and
 8 tell her to get out my house because she always wanted
 9 to go with Shawn Drumgold, that kind of thing, like
 10 that.
 11 Q. Did you have any conversation with
 12 either of the Grahams about whether or not they had
 13 assisted in getting a new trial or in testifying at
 14 the motion for new trial?
 15 MS. SCAPICCHIO: Objection.
 16 A. No. The only thing that was -- during
 17 the feeding of everybody it was, there was a lot of
 18 people there, Micky was trying to make me remember who
 19 she was, but she didn't, she didn't know that I had
 20 already talked to Rhonda.
 21 MS. SCAPICCHIO: Objection.
 22 A. So I really knew who she was. And she
 23 said that -- no, I asked her how long have you been
 24 with Shawn--
 25 MS. SCAPICCHIO: Objection.

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1 A. -- and she said for a while. She said I
 2 testified against Shawn. And I said testified against
 3 Shawn. She said but that's all been straightened out,
 4 that's all been straightened out. And I left it
 5 Q. Did you understand from this
 6 conversation that she was romantically involved with
 7 Shawn?
 8 MS. SCAPICCHIO: Objection.
 9 A. Yeah, they were laying on my sofa, yeah.
 10 Q. Have you ever asked Shawn whether he was
 11 involved in the murder of Tiffany Moore?
 12 MS. SCAPICCHIO: Objection.
 13 A. No.
 14 Q. Has he ever said to you whether he was
 15 involved?
 16 MS. SCAPICCHIO: Objection.
 17 A. No, no.
 18 Q. Have you ever asked him if he knew who
 19 was involved in the murder?
 20 MS. SCAPICCHIO: Objection.
 21 A. The only thing Shawn ever said was about
 22
 23 MS. SCAPICCHIO: Objection.
 24 A. Humboldt, Humboldt, Castlegate, Humboldt
 25 and Apple and everybody was doing this and that and

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1 somebody was riding in a car, it was like you know, I
 2 don't know. I don't remember word for word cause it
 3 wasn't of interest to me per se, about a car and
 4 something, I don't know. I really don't remember all
 5 of the other stuff, Rhonda listens intently.
 6 She's into Shawn like that, I'm not.
 7 Q. Have you spoken with Mrs. Drumgold
 8 Shawn's mother about his conviction or his release?
 9 A. No. He asked Rashawna to call his
 10 mother while he was there.
 11 MS. SCAPICCHIO: Objection.
 12 A. And Rashawna, first Rashawna said why, I
 13 don't even know the lady. She's only seen
 14 Ms. Drumgold maybe twice in her life. So he kept
 15 telling her no, call call call call call her, call
 16 her. So Rashawna did call. And she was very upset.
 17 And she you know she was -- and then Shawn took the
 18 phone and he was, only thing I heard her yelling and
 19 him saying I know, I know, I know I'm coming back, *I'm*
 20 coming back now, I'm coming back now, I'm on my way
 21 back, something like that, I'm on my way back.
 22 Q. Do you know the name or do you know the
 23 person Olisa or Lisa Graham?
 24 MS. SCAPICCHIO: Objection.
 25 Q. Does that name mean anything to you?

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1 A. I've heard the name.
 2 Q. Do you, can you tell me how you've heard
 3 the name?
 4 A. Through Rhonda.
 5 Q. Now, you and I spoke last week about
 6 this deposition --
 7 A. Yes.
 8 Q. Right. Have you spoken with anybody
 9 else representing either Mr. Drumgold or any of the
 10 defendants in this case?
 11 A. After I spoke to you?
 12 Q. At any time.
 13 A. I spoke to her.
 14 Q. Okay. And by her you mean
 15 Ms. Scapicchio?
 16 A. Ms. Scapicchio.
 17 Q. When did you speak with her?
 18 A. Oh God, what day was it, it was the day
 19 I got this thing underneath my door.
 20 Q. The subpoena?
 21 A. _ Right. And what I did was I called my
 22 brother in Boston and I asked him I said do I know
 23 need a lawyer, I said, you know I'm sick and I said
 24 these people are just, you know, and I explained to
 25 the person that I wasn't going to accept it. Whoever

21 (Pages 78 to 81)

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1 called me and said I'm coming by your house you know
 2 if you would nicely take it, it will make things easy
 3 for everyone or whatever. I said no, I'm not opening
 4 my door, I'm sick, I'm not coming, whatever whatever.
 5 So I called ray brother. And my brother said you would
 6 have, he doesn't know whether I had to have a lawyer
 7 that would have to have passed the Bar in New York and
 8 whatever, New York or Boston, because he — so I said
 9 well, it says here that the deposition is going to be
 10 in New York. So he said well, I'll give you this
 11 name. So he gave me a name —
 12 Q. Is that Mr. Denner?
 13 A. Denner. All right, so I spoke to that
 14 person and she said you got the wrong person that's
 15 not criminal, that's something else, so she put
 16 another lady on the phone and I talked to her and she
 17 said you know when you talk to a lawyer it's -- what's
 18 the word?
 19 MS. SCAPICCHIO: Confidential.
 20 A. Yeah, It's confidential and it won't go
 21 any further than this and that and whatever whatever.
 22 What is this about. And I told her you know what it's
 23 about and I said they claim it's a high profile case
 24 and I don't even know why I'm being called I said 17
 25 years ago nobody called my name, I don't know, I don't

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1 know what could I tell them that I didn't tell them 20
 2 years ago.
 3 Q. Is this in a conversation with
 4 Ms. Scapicchio or with another person?
 5 A. No, no.
 6 Q. This is somebody else?
 7 A. Okay. So what she said, she says well I
 8 have somebody, I know somebody that would, will take
 9 your, mat might, no, she didn't say would, she said
 10 that might take your case. She said I know her very
 11 well. She is's a very nice person, da da da. I said
 12 oh God, thank you. I was just so glad to hear anybody
 13 say I'm going to help you. So she said well, here's
 14 her phone number. I jotted it down on the back of my
 15 thing. And she said call her and I'll talk to her and
 16 I'll tell her what's going on.
 17 Q. Do you know the name of this person that
 18 you were speaking to who offered you assistance, this
 19 woman?
 20 A. No, she just said that she was with the
 21 civil, they put me to a civil and said it wasn't a
 22 criminal.
 23 Q. Was this with Mr. Denner's office?
 24 A. With Mr. Denner's office. Because she
 25 said they were both in the same building.

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1 Q. And she gave you a phone number for
 2 another person?
 3 A. Right
 4 Q. Was that Ms. Scapicchio?
 5 A. Yes.
 6 Q. And did you have a conversation with
 7 Ms. Scapicchio?
 8 A. Yes.
 9 Q. What was that conversation?
 10 A. She called back. She said I'm returning
 11 your call. I said basically the same thing, I need a
 12 lawyer to represent, to represent me, I'm sick, I
 13 can't you know, go all over whatever. So she said
 14 that well, you can't expect your memory to be what it
 15 was 20 years ago. And I said no, I can't. So she
 16 said — I said because I'm going to the doctor. I
 17 said I'm going to the doctor Monday morning. So she
 18 said to me that she has someone that she thinks would
 19 represent me but she wanted the letter first.
 20 Q. What letter?
 21 A. From the doctor.
 22 Q. What are you referring to, what do you
 23 mean?
 24 A. You know like I can't remember, like. I
 25 know my body is falling apart but my mind is cool.

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1 Q. Do you have any problems with your
 2 memory?
 3 A. No. I mean some things, I mean we all
 4 forget, I mean you know I forgot my ex-husband. I
 5 forget a lot, I forget somethings, yes I forget
 6 Q. So how did this discussion -
 7 A. I called -- I hung up and Rashawna said
 8 to me well, you didn't get any information. So I
 9 called her back and I asked her about, I said well can
 10 you give me the name of mis person because I only had
 11 like few days I mean like to me time was like pushing
 12 on me. And she said well, we'll talk when you bring
 13 the letter.
 14 Q. And this is a letter from a doctor
 15 saying that you have memory problems?
 16 A. Yeah, that I whatever, I have memory.
 17 MS. SCAPICCHIO: Objection.
 18 Q. What was mis letter supposed to be?
 19 A. The letter was supposed to say that I
 20 can't, well during my illness with my problems and
 21 whatever that I cant remember, I don't remember, I
 22 don't remember things well. So when she said I had to
 23 bring the letter before I could get the name I just,
 24 you know, I said oh forget it. So then somebody named
 25 Adam - no, she called back and she spoke to Rashawna

22 (Pages 82 to 85)

1 and when she was speaking with Rashawna I wasn't
 2 trying to avoid her I was on the other line cause I
 3 have three lines in my house, and she asked -
 4 Rashawna says she's on the other line and she said to
 5 Rashawna well, tell her she can call me back or she
 6 doesn't have to. So I told Rashawna, I said well that
 7 means I don't have to because I don't have, I don't
 8 have anything to give her, I don't have anything. So
 9 I started going on to the next somebody to help me.
 10 Q. When you spoke with Ms. Scapicchio and
 11 told her that you had an appointment set up to see
 12 your doctor?
 13 A. Yeah, Monday.
 14 Q. Did you tell her that you had concerns
 15 about your memory?
 16 A. No.
 17 Q. How did that come up?
 18 A. It came up because I said I don't know
 19 what they're looking for. I don't know what they want,
 20 and one thing she did ask me was, I said, no I said to
 21 her I have an idea of what, what they want, and she
 22 said the gun, and I said yes. And she said did you
 23 see the gun. And I said yes. And then I got
 24 paranoid. After I said that then I got, you know, I
 25 got kind of you know, I got scared so I called John

1 back and I said listen, you know, all these people, I
 2 don't know who they are, I don't know who they are I
 3 don't know who I'm talking to, what am I supposed to
 4 say to who and what and whatever. And then that's
 5 when he kindly explained what a deposition was and —
 6 MS. SCAPICCHIO: Who is this, John,
 7 you called John back.
 8 MR. ROACHE: There's no question.
 9 MS. SCAPICCHIO: I didn't hear what
 10 she said. She said she called John back, John.
 11 Q. John Gamel, correct?
 12 MS. SCAPICCHIO: Is that the
 13 investigator?
 14 THE WITNESS: Right
 15 Q. Go on. He told you what a deposition
 16 was.
 17 A. I asked him the only thing I want to
 18 know is can you explain to me what a deposition is. I
 19 said you know I've been to court with Rhonda's other
 20 fathers and I've never, this right here is just you
 21 know. And he explained to me what was you know, he
 22 said this person is going to be there, that person and
 23 this person, and this person, and all you have to do
 24 is tell the truth. And I said well I'm fine then.
 25 I'm fine, I'm cool.

1 Q. Did you have any other conversations
 2 with Ms. Scapicchio about your obtaining a doctor's
 3 note?
 4 A. Not after that. Adam called.
 5 Q. And Adam is who?
 6 A. I have no idea.
 7 Q. Did he identify himself as?
 8 A. He said Adam from that office.
 9 Q. From Ms. Scapicchio's office?
 10 A. Right.
 11 Q. Did you actually speak with Adam?
 12 A. Yeah.
 13 Q. What did he say to you and you say to
 14 him?
 15 A. He - can I look in my pocketbook cause
 16 I wrote some of it down.
 17 Q. Sure.
 18 A. These are the names that the Bar
 19 Referral - I did talk to this person here in depth.
 20 Q. Okay. We're not going to ask for any
 21 conversations that you had with any kind of an
 22 advocate, okay, that's confidential.
 23 A. Okay, okay. He called at 12:20. He
 24 called at 12:20 p.m. that day.
 25 Q. You have to keep your voice up so we can

1 get you on the recording.
 2 A. The caller ID had came up as
 3 (617)263-7400.
 4 Q. Okay?
 5 A. Okay. He introduced, he asked for me.
 6 I said this is Madelyne, and the first tiling -- he
 7 asked a stupid question. He asked if the subpoena, was
 8 still on. And I said well don't you know. Like that
 9 And then the next question he asked was am I
 10 represented by - am I going to be represented by
 11 counsel. And then I said should I be, you know like
 12 should I be. I wasn't trying to be smart He was
 13 asking the question so I figured maybe I should. Then
 14 he asked did I get a doctor's note. I said no. And
 15 he said is there any reason that you don't have one.
 16 And I said to him, listen, I'll call you back in 20
 17 minutes.
 18 Q. Did you call him back?
 19 A. No.
 20 Q. Can we mark this envelope.
 21 A. Yeah.
 22 Q. Thanks.
 23 (Exhibit No. 226, Envelope, was
 24 marked for identification at this time.)
 25 MS. HARRIS: 226.

1 Q. Okay. Did you have any other
2 conversation with anyone else from Ms. Scapicchio's
3 office?
4 A. No.
5 Q. Are there any other documents that you
6 brought with you today that are notes of your
7 conversations with Ms. Scapicchio's office or myself?
8 A. No.
9 Q. You mentioned having conversations with
10 JohnGamel?
11 A. Yes.
12 Q. And you understand Mr. Gamel to be an
13 investigator working for the defense in this case?
14 MS. SCAPICCHIO: Objection.
15 Q. Do you understand that?
16 A. I understood that when he came to my
17 house.
18 Q. On how many occasions have you met with
19 Mr. Gamel?
20 A. Two, three.
21 Q. In any of those meetings has Mr. Gamel
22 ever told you what he wanted you to testify to?
23 A. No. I didn't - that's why I was kind
24 of upset with him because he wasn't telling me
25 anything, really. I thought that when he came and he

1 introduced himself and showed me his you know ID and
2 said he wanted to you know, talk to me about Shawn
3 Drumgold, my first comment to him was gee, I've been
4 waiting 15 years to talk to people. Like you know, a
5 kind of smart ass answer. But we just, I just started
6 talking to him asking him, you know he asked me like
7 how did Rhonda and Shawn meet, and I think I blubbered
8 more than he wrote. I mean I think he was trying to,
9 catch up with my mouth.
10 Q. I don't want to get into your business
11 but you've mentioned here being sick, is there
12 anything about your health condition that impacts your
13 ability to testify truthfully?
14 A. No, no.
15 MS. HARRIS: I don't think I have any
16 other questions. Thank you very much,
17 Mrs. Hamilton. The other attorneys here may want to
18 ask a couple.
19 THE VIDEOGRAPHER: Off the record
20 1:09 p.m.
21 (There was a break in the
22 proceedings.)
23 THE VIDEOGRAPHER: We're going back
24 on the record at 1:38 p.m. This is the beginning of
25 tape three and the deposition of Madelyne Powell

1 Hamilton.
2 CROSS-EXAMINATION BY MR. ROACHE:
3 Q. Good afternoon, Ms. Hamilton, my name is
4 John Roache?
5 A. Afternoon.
6 Q. And I represent the City of Boston and
7 former Boston Police Commissioner Francis Roache. I
8 just have a few questions to ask of you in follow up
9 to some of the questions that Ms. Harris asked and a
10 couple of other questions as well.
11 A. Okay.
12 Q. You indicated that your daughter Rhonda
13 was a student in Newton?
14 A. Yes.
15 Q. When did she begin the Metco program?
16 A. In the fourth grade.
17 Q. In the fourth grade, okay. And when she
18 met Shawn Drumgold that was approximately in what
19 year?
20 MS. SCAPICCHIO: Objection.
21 A. She was 13.
22 Q. She was 13?
23 A. Right.
24 Q. Prior to her meeting Shawn Drumgold had
25 Rhonda ever been involved in any trouble with the law?

1 MS. SCAPICCHIO: Objection.
2 A. Nope.
3 Q. Were you aware prior to her meeting
4 Shawn Drumgold as to whether or not she had used
5 drugs?
6 MS. SCAPICCHIO: Objection.
7 A. No.
8 Q. Did Rhonda graduate from high school?
9 A. No.
10 Q. When did Rhonda stop going to high
11 school?
12 MS. SCAPICCHIO: Objection.
13 A. She stopped maybe in the 7th or 8th.
14 Q. 7th or 8th grade?
15 A. Uh-huh.
16 Q. What school in Newton was she attending
17 at that time?
18 A. The day school.
19 Q. And she would be bused in the morning
20 and bused back home in the afternoon?
21 A. Yes, right, right.
22 Q. And the bus stop was located on Blue
23 Hill Avenue and where?
24 MS. SCAPICCHIO: Objection.
25 A. Blue Hill Avenue and Pasadena Road.

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<p>1 Q. What was your response to her?</p> <p>2 MS. SCAPICCHIO: Objection.</p> <p>3 A. I said yes I seen it.</p> <p>4 Q. What was attorney Scapicchio's reaction</p> <p>5 to your saying yes you saw it?</p> <p>6 MS. SCAPICCHIO: Objection.</p> <p>7 A. That's when we got into the doctor's</p> <p>8 note.</p> <p>9 Q. Who suggested a doctor's note?</p> <p>10 MS. SCAPICCHIO: Objection.</p> <p>11 A. I told her that I had an appointment</p> <p>12 Monday.</p> <p>13 Q. Monday being yesterday?</p> <p>14 A. No.</p> <p>15 Q. Today is Tuesday?</p> <p>16 A. No. that Monday before then.</p> <p>17 Q. A week ago?</p> <p>18 A. Right.</p> <p>19 Q. You had a doctor's appointment a week</p> <p>20 ago yesterday?</p> <p>21 A. Right</p> <p>22 Q. You told that to attorney Scapicchio?</p> <p>23 A. Yes.</p> <p>24 Q. What if anything did attorney Scapicchio</p> <p>25 tell you?</p>	<p>1 MS. SCAPICCHIO: Objection.</p> <p>2 Q. Is that true?</p> <p>3 MS. SCAPICCHIO: Objection.</p> <p>4 A. Yes, that's true. And that she couldn't</p> <p>5 supply me with an attorney unless she saw the note,</p> <p>6 she had to see the note first.</p> <p>7 Q. Did attorney Scapicchio —</p> <p>8 A. I didn't know who she was.</p> <p>9 Q. Did attorney Scapicchio suggest to you</p> <p>10 that you could avoid the taking of your deposition by</p> <p>11 presenting a doctor's note saying that your memory was</p> <p>12 faulty because of your health?</p> <p>13 A. Yes.</p> <p>14 MS. SCAPICCHIO: Objection.</p> <p>15 Q. She did?</p> <p>16 A. Yes.</p> <p>17 Q. When did you receive the phone call from</p> <p>18 was it Aaron?</p> <p>19 A. Adam.</p> <p>20 Q. Adam?</p> <p>21 A. Friday.</p> <p>22 Q. This past Friday?</p> <p>23 A. Friday.</p> <p>24 Q. Okay. And did you call Adam or did he</p> <p>25 call you?</p>
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<p>1 MS. SCAPICCHIO: Objection.</p> <p>2 A. She asked me if I could get a note.</p> <p>3 Q. What type of note?</p> <p>4 MS. SCAPICCHIO: Objection.</p> <p>5 A. A memory -- for my memory cause I'm sick</p> <p>6 and you don't, you're sick and you don't remember, you</p> <p>7 can't remember that far back.</p> <p>8 Q. Whose words were they, were they your</p> <p>9 words or attorney Scapicchio's words that you are sick</p> <p>10 you can't remember mat far back?</p> <p>11 MS. SCAPICCHIO: Objection.</p> <p>12 A. Those were her words,</p> <p>13 MS. SCAPICCHIO: Objection.</p> <p>14 Q. Did you dispute those words?</p> <p>15 A. Did I dispute them, what I said to her</p> <p>16 was I want to know do I have, do I need, can I get an</p> <p>17 attorney.</p> <p>18 Q. And you've testified earlier there's</p> <p>19 nothing about your health that impairs your memory</p> <p>20 today, correct?</p> <p>21 A. No, no, no.</p> <p>22 MS. SCAPICCHIO: Objection.</p> <p>23 Q. So was it attorney Scapicchio who</p> <p>24 mentioned to you to try to get a doctor's note saying</p> <p>25 that your memory was impaired because of your health?</p>	<p>1 A. No, he called me.</p> <p>2 Q. What, if anything, did Adam say to you?</p> <p>3 A. He asked for me. I didn't answer the</p> <p>4 phone. My granddaughter answered the phone and said</p> <p>5 somebody from 617 named Adam wants to speak to you.</p> <p>6 Q. Did you speak with Adam?</p> <p>7 MS. SCAPICCHIO: Objection.</p> <p>8 A. Yes.</p> <p>9 Q. What did he first say to you?</p> <p>10 A. The first thing he asked was, he was</p> <p>11 calling to find out if the deposition was still on.</p> <p>12 Q. Okay.</p> <p>13 A. And I said, don't you know.</p> <p>14 Q. Who do you understand Adam to be?</p> <p>15 A. From her office.</p> <p>16 Q. When you say her, are you referring to</p> <p>17 attorney Scapicchio?</p> <p>18 A. Yes, because that's where he said he was</p> <p>19 from.</p> <p>20 Q. He told you he was from attorney</p> <p>21 Scapicchio's office?</p> <p>22 A. Yes, that's where he said he was from.</p> <p>23 Q. And he asked you if the deposition was</p> <p>24 still on?</p> <p>25 A. Right. He asked me if I had obtained an</p>

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<p>1 does it include any of the children?</p> <p>2 A. No, my disability.</p> <p>3 Q. Any of the children that you have since</p> <p>4 adopted receive SSI?</p> <p>5 A. Rashawna.</p> <p>6 Q. How much does she receive?</p> <p>7 A. Receives SSI 646,</p> <p>8 Q. Is that monthly?</p> <p>9 A. Monthly.</p> <p>10 Q. Any other of your children or</p> <p>11 grandchildren, I'm sorry?</p> <p>12 A. Kayla Dorsett Powell.</p> <p>13 Q. What does she receive SSI for?</p> <p>14 A. She doesn't receive SSI, she receives</p> <p>15 adoption subsidy.</p> <p>16 Q. Oh, okay. And what's the adoption</p> <p>17 subsidy?</p> <p>18 A. \$800 I think.</p> <p>19 Q. Is that a month?</p> <p>20 A. A month.</p> <p>21 Q. Anyone else?</p> <p>22 A. Madelyne.</p> <p>23 Q. Madelyne —</p> <p>24 A. Powell.</p> <p>25 Q. What does she receive?</p>	<p>1 A. Not hyper, not the hyper, ADD.</p> <p>2 Q. When was she diagnosed with ADD?</p> <p>3 A. She was two.</p> <p>4 Q. So what about Shawn, Jr., did he receive</p> <p>5 any SSI or any other benefits before he went in the</p> <p>6 Marines?</p> <p>7 A. He received welfare from his mother from</p> <p>8 the beginning when she had him.</p> <p>9 Q. When you say welfare from his mother?</p> <p>10 A. From his mother.</p> <p>11 Q. She applied for welfare?</p> <p>12 A. Right, in Boston.</p> <p>13 Q. In Boston. Okay, so he was receiving</p> <p>14 welfare check from Boston while he was living with</p> <p>15 you?</p> <p>16 MR. ROACHE: Objection.</p> <p>17 A. No.</p> <p>18 Q. So that was just for a short period of</p> <p>19 time while he was in Boston he got welfare benefits?</p> <p>20 A. Eighteen months, exactly.</p> <p>21 Q. Okay. And you had indicated you receive</p> <p>22 SSI as a result of the arthritis; is that right?</p> <p>23 A. Right.</p> <p>24 Q. Does it also include your diabetes or is</p> <p>25 that not a basis for the SSI?</p>
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<p>1 A. The same.</p> <p>2 Q. \$800 adoption subsidy per month?</p> <p>3 A. Right.</p> <p>4 Q. Anyone else?</p> <p>5 A. Tyleek.</p> <p>6 Q. What does Tyleek receive?</p> <p>7 A. 600 and something maybe.</p> <p>8 Q. Is that an adoption subsidy or that's</p> <p>9 SSI?</p> <p>10 A. No, that's adoption, they cant receive</p> <p>11 both</p> <p>12 Q. So Kayla, Madelyne and Tyleek all</p> <p>13 receive adoption subsidies per month?</p> <p>14 A. Right, they all have special needs.</p> <p>15 Q. They all have special needs, okay.</p> <p>16 Let's talk about Rashawna for a minute she receives</p> <p>17 SSI of 646 per month?</p> <p>18 A. Yes.</p> <p>19 Q. And is that as a result of the birth</p> <p>20 defect?</p> <p>21 A. Yes.</p> <p>22 Q. Any other issues with Rashawna that</p> <p>23 require her to get SSI other than the birth defects?</p> <p>24 A. She had AD --</p> <p>25 Q. -HD?</p>	<p>1 A. No, it's a basis for it.</p> <p>2 Q. So in addition to the arthritis the</p> <p>3 other basis for the SSI is the diabetes?</p> <p>4 A. Yes.</p> <p>5 Q. Any other medical ailments that resulted</p> <p>6 in your filing for an SSI claim other than the</p> <p>7 diabetes and the arthritis?</p> <p>8 A. I had a sciatic nerve problem.</p> <p>9 Q. When was that?</p> <p>10 A. When I was 21, after I had my</p> <p>11 hysterectomy.</p> <p>12 Q. And at that time was it Dr. Shapiro who</p> <p>13 was your doctor?</p> <p>14 A. No.</p> <p>15 Q. Who was your doctor back then for the</p> <p>16 sciatic nerve problem?</p> <p>17 A. In Boston, he's dead now, Dr. Elliot</p> <p>18 Finer.</p> <p>19 Q. What hospital did he practice from?</p> <p>20 A. I can't remember. The round hospital,</p> <p>21 do you know, Brookline Hospital.</p> <p>22 Q. Brookline Hospital?</p> <p>23 A. Its round.</p> <p>24 Q. When did Dr. Finer treat you?</p> <p>25 A. After I had Rhonda '69.</p>

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